

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JUDITH STRICKLAND, Derivatively On Behalf of
Nominal Defendant CHINA NORTH EAST
PETROLEUM HOLDINGS LIMITED,

Plaintiff,

v.

WANG HONGJUN, YU LIGUO, ROBERT C. BRUCE,
EDWARD M. RULE, LI JINGFU, ZHANG YANG DIO,
JU GUIZHI,

Defendants,

- and -

CHINA NORTH EAST PETROLEUM HOLDINGS
LIMITED,

Nominal Defendant.

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ECF Case

10-cv-05445-MGC

NOTICE OF MOTION

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PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law and all prior pleadings in this action, defendant Robert C. Bruce hereby moves, pursuant to Federal Rules of Civil Procedure 9(b) and 12(b)(6) to dismiss the Verified Amended Shareholder Derivative Complaint. Pursuant to Judge Cedarbaum's Individual Rules of Practice, this motion is returnable for oral argument at 10:00 a.m. on Thursday, May 19, 2011.

Dated April 20, 2011

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By:

/s/ Edwin G. Schallert

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